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Filing date: **04/20/2015**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91221037
Party	Defendant Pronoia Culture, LLC
Correspondence Address	PRONOIA CULTURE, LLC PRONOIA CULTURE, LLC 645 FRONT ST UNIT 1106 SAN DIEGO, CA 92101-7085  jason@genesesconsulting.com;mishelle@ge
Submission	Answer
Filer's Name	Luke Brean
Filer's e-mail	tmsupport@breanlaw.com, luke@breanlaw.com
Signature	/LB/
Date	04/20/2015
Attachments	OPP-ApplicantsAnswer -- 86352017.pdf(73459 bytes )

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In the matter of: U.S. Serial No. 86352017

Date of filing: Jul. 30, 2014

Mark: PRONOIA

Date of Publication: Jan. 27, 2015

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SAN PATRICK, S.L.  
Opposer,

v.

Mark: PRONOIA

Pronoia Culture, LLC  
Applicant.

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UNITED STATES PATENT AND TRADEMARK OFFICE  
Trademark Trial and Appeal Board  
P.O. Box 1451  
Alexandria, VA 22313-1451

**APPLICANT'S ANSWER TO NOTICE OF OPPOSITION**

Applicant, Pronoia Culture, LLC ("Applicant"), for its Answer to the Notice of Opposition filed by SAN PATRICK, S.L. against application for registration of Applicant's trademark PRONOIA, serial number 86352017, filed Jul. 30, 2014 and published in the Official Gazette of Jan. 27, 2015, pleads and avers as follows:

1. Denied.

2. Denied.

3. Denied.

4. Applicant does not have sufficient knowledge or information to form a belief as to the allegations contained therein and accordingly denies the allegations.

5. Applicant does not have sufficient knowledge or information to form a belief as to the allegations contained therein and accordingly denies the allegations.

6. Applicant does not have sufficient knowledge or information to form a belief as to the allegations contained therein and accordingly denies the allegations.

7. Applicant does not have sufficient knowledge or information to form a belief as to the allegations contained therein and accordingly denies the allegations.

8. Applicant does not have sufficient knowledge or information to form a belief as to the allegations contained therein and accordingly denies the allegations.

9. Denied.

10. Denied.

11. Denied.

12. Denied.

13. Denied.

#### AFFIRMATIVE DEFENSES

14. There is no likelihood of confusion, mistake or deception because, inter alia, Applicant's mark and the pleaded mark of Opposer are not confusingly similar in sight, sound, or commercial impression. Moreover, the goods and services in this case are significantly different and target different consumers.

15. Opposer will not be damaged by the registration of Applicant's trademark.

In view of the foregoing, Applicant contends that this opposition is groundless and baseless in fact; that Opposer has not shown wherein it will be, or is likely to be, damaged by the registration of Applicant's trademark; that Applicant's trademark is manifestly distinct from any alleged mark of the Opposer or any designation of the Opposer and Applicant prays that this Opposition be dismissed and that Applicant be granted registration of its trademark.

Applicant hereby appoints Luke Brean, of the law firm of BreanLaw, LLC, member of the Oregon bar, as its attorney with full power of substitution and revocation, to prosecute this opposition proceeding, and to transact all business in the U.S. Patent and Trademark Office in connection herewith.

Dated: Apr. 20, 2015

Respectfully submitted,

**/LB/**

Luke Brean

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## **CERTIFICATE OF SERVICE**

This is to certify that a copy of this APPLICANT'S ANSWER TO NOTICE OF OPPOSITION, is being deposited with the U.S. Postal Service on Apr. 20, 2015 by first-class mail, postage prepaid to the counsel of record in an envelope addressed as follows:

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